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Attorneys for Defendants

KAISER PERMANENTE INSURANCE

COMPANY and KAISER FOUNDATION

HEALTH PLAN, INC.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

TOBY SIDLO, on behalf of himself, and
all others similarly situated,

Plaintiff(s),

vs.

CIVIL NO. 15-00269 ACK-RLP

DECLARATION OF NATHAN
BASSEEN IN SUPPORT OF
DEFENDANT KAISER
FOUNDATION HEALTH PLAN

KAISER PERMANENTE INSURANCE
COMPANY, a California non-profit
corporation, KAISER FOUNDATION
HEALTH PLAN, INC., a foreign non-
profit corporation, and DOE
DEFENDANTS 1-50,

Defendants.

KAISER FOUNDATION HEALTH
PLAN, INC., a foreign non-profit
corporation,

Plaintiff,

vs.

HAWAII LIFE FLIGHT
CORPORATION, a Hawaii corporation,
and AIR MEDICAL RESOURCE
GROUP, INC., a Utah corporation,

Defendants.

HAWAII LIFE FLIGHT
CORPORATION, a Hawaii corporation,

Counterclaim Plaintiff,

vs.

KAISER FOUNDATION HEALTH
PLAN, INC., a foreign non-profit
corporation,

INC.'S MOTION TO AMEND
QUALIFIED PROTECTIVE ORDER

HEARING: August 4, 2016

TRIAL: January 10, 2017

JUDGE: Hon. Alan C. Kay

CIVIL NO. 16-00073 ACK-RLP

Counterclaim Defendant.

DECLARATION OF NATHAN BASSEEN

I, Nathan Basseen, declare as follows:

1. I am Managing Director of Berkeley Research Group (“BRG”).

I have worked at BRG since 2010. I have been retained by Kaiser Foundation Health Plan, Inc. (“KFHP”) to serve as an Expert in this case. Attached as Exhibit A is a true and correct copy of my curriculum vitae, which includes a list of cases in which I have testified as an Expert witness.

2. I have never been employed by KFHP, Kaiser Permanente Insurance Company, or any other Kaiser company.

3. I have never been employed by, consulted for or received any compensation from any air ambulance or air transport company. I also have never been involved in any competitive decision-making for any air ambulance or transport company.

4. In my experience as an Expert witness and/or consultant in litigation matters, I routinely review and analyze material and information designated as “confidential” and/or “confidential attorney-eyes only” pursuant to a protective order. I have never violated any protective order, nor have I ever been

accused of violating a protective order.

5. I have reviewed the Amended Qualified Protective Order (“QPO”) in effect in this case and have signed the certification in Exhibit A to the QPO. I agree to be bound by all of its terms.

I declare under the penalty of perjury under the laws of the United States of America that the following is true and correct.

Executed at Chicago, Illinois on August 1, 2016.



NATHAN BASSEEN